

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-vs-

ALEXI SAENZ,

Defendant.

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16-CR-403 (GRB)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, based on the reasons and authorities set forth in the previously filed sealed submissions made by the defense and the government, Defendant Alexi Saenz moves this Court, to conduct a sealed hearing in connection with the above-captioned case. Undersigned counsel have conferred with counsel for the government, who consent to this motion.

Dated: Brooklyn, New York
June 17, 2025

Respectfully submitted,

/s/ Natali Todd
NATALI TODD
Law Offices of Natali J.H. Todd, P.C.
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Tel.: 718-797-3055

/s/ Victor J. Abreu
/s/ Peter Williams
/s/ Anna K. Christensen
VICTOR J. ABREU
PETER WILLIAMS
ANNA K. CHRISTENSEN
Federal Community Defender Office
for the Eastern District of Pennsylvania
601 Walnut Street, Suite 540W
Philadelphia, PA 19106
Tel.: 215-928-1100

Counsel for Alexi Saenz

CERTIFICATE OF SERVICE

I, Peter Williams, hereby certify that on this date I caused the foregoing to be served on the parties of record via ECF.

/s/ Peter Williams
Peter Williams

Dated: June 17, 2025